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February 27, 2020

Hon. Mary Kay Vyskocil  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St. New York, NY 10007-1312

Re: Case: DeJesus v Kane  
Docket No: 19-CV-07914-GHW  
Our File Number: 19R2357

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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DATE FILED: 2/28/2020

Dear Judge Vyskocil:

This office represents the defendants in the above matter. The parties have not completed discovery at this time, although we anticipate it will be completed shortly. The defendants request a 45 day extension of time to complete fact discovery and depositions, which would extend the deadline to April 15, 2020. Additionally, at this time expert discovery is to be completed by April 15, 2020 and there is a conference with the Court currently scheduled for April 30, 2020. We request adjournments of those dates as well.

We have contacted the plaintiff's attorney, but he was unavailable today due to his travel schedule.

Thank you.

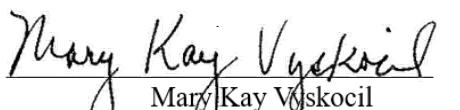
Very truly yours,

Susan Duncan

CC:  
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Via email to ddudley@joneshacker.com

GRANTED. The deadline for fact discovery is extended to April 15, 2020. The deadline for expert discovery is May 29, 2020. The conference on April 30, 2020 is adjourned sine die. The parties must submit a joint letter to the Court by 4:00PM on May 15, 2020 updating the Court on the status of discovery and whether any party anticipates filing a motion for summary judgment. SO ORDERED

Date: 2/28/2020  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge